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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

Carrie Ferrara Clark,
Plaintiff,
v.
City of Tucson,
Defendant.

CV-14-02543-TUC-CKJ

**JURY QUESTIONS
DURING TRIAL**

Jury questions during trial.

Day 7

April 9, 2019

#1 HR policy as well as email with HR state that if there were "documented fitness" issues with Carrie then she could have a fitness of duty exam by Dr. Peete. why did you do the drill rather than request a fitness for duty?

#2 stated he rode alone in a car with his superior back to the fire station. why did you not ride back with the team on the truck?

offer me
a cell car

#3 How many times before the drill for Tyler had you done these type drills while still out in the field rather than at the station or training facility?

what is a "red line" used for? How
different from $1\frac{3}{4}$ " line? Carriage put
down $1\frac{3}{4}$ and picked up red line - why?

May 22 Drill - were air packs included in

turnouts?

(33)

311

How often did you speak to defense attorneys prior to trial? Were you coached in questions and answers?

35

When the federal law on lactation facilities initially was passed, was the city of Tucson and/or TFD aware or notified by the government?

36

was Nicky Springer moved from Fire
Prevention as well due to the "drama"
or reprimanded with a counseling as
Came Clark?

37

You stated you had a need for paramedics and that all stns were compliant w/ law. Why not assign Carre to a paramedic unit when you had to make ~~the~~ ^{a reassignment?} Did she not want a paramedic assignment?

①

Primarily moved out of

Fire Prevention because of

the Stinger incident

(primarily - your testimony)

what/why else? As pertains
directly to Ms Clark

②

Is OEOP a legal body

i.e. can they intercept

law - are they lawyers

38

Would assignment to a prevention
truck have affected seniority in
this particular case (Clark)?

39